

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF ALABAMA
EASTERN DIVISION

B.B., a minor, by and)
Through his mother and next friend,)
OWENA KNOWLES,)
)
Plaintiff,) CASE NO.:
) 3:06-CV-00715-MHT
v.)
)
PAWN CITY, INC.; NORINCO)
a/k/a CHINA NORTH INDUSTRIES)
CORPORATION, et al.,)
)
Defendants.)

RENEWED MOTION TO DISMISS

COMES NOW defendant, Qiqihar Hawk Industries Co., Ltd., and in response to the filing of plaintiff's Second Amended Complaint hereby renews its motion pursuant to Rule 12(b)(2) of the Federal Rules of Civil Procedure to dismiss Qiqihar Hawk for lack of jurisdiction over the person. Qiqihar Hawk hereby adopts and incorporates by this reference its previously filed motion to dismiss as if fully set forth herein.

Respectfully submitted,

/s/Todd M. Higey
Todd M. Higey
Ala. Bar No. HIG019
Attorney for Qiqihar Hawk
Industries Co. Ltd.
ADAMS AND REESE LLP
2100 3rd Avenue North, Suite 1100
Birmingham, Alabama 35203-3367
Telephone: (205) 250-5000
Fax: (205) 250-5034
E-mail: todd.higey@arlaw.com

CERTIFICATE OF SERVICE

I hereby certify that on August 1, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the persons listed below:

David J. Hodge, Esq.
PITTMAN, DUTTON, KIRBY & HELLUMS, P.C.
2001 Park Place North
1100 Park Place Tower
Birmingham, Alabama 35203

James C. Barton, Jr., Esq.
Alan D. Mathis, Esq.
JOHNSTON, BARTON, PROCTOR & POWELL, LLP
2900 AmSouth/Harbert Plaza
1901 Sixth Avenue North
Birmingham, Alabama 35203

Nick Wooten, Esq.
WOOTEN LAW FIRM, P.C.
P.O. Drawer 290
Lafayette, Alabama 36862

John D. Gleissner, Esq.
ROGERS & ASSOCIATES
3000 Riverchase Galleria
Suite 650
Birmingham, Alabama 35244

/s/Todd M. Higey
Of Counsel